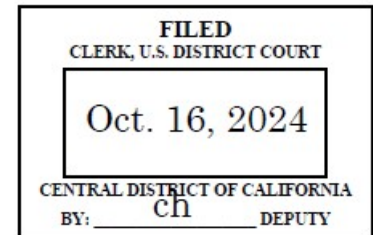


## UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

SHUNYU AN, aka JANE YANG,  
aka VIVIAN AN,

Defendant.

Case No. 2:24-mj-06320-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of July 12, 2024 in the county of Los Angeles in the Central District of California, the defendant violated:

*Code Section*

18 U.S.C. § 1546

*Offense Description*Fraud and Misuse of Visas, Permits,  
and Other Documents

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

/s/ Sarah Kim

*Complainant's signature*

Sarah Kim, Special Agent

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: October 16, 2024

Brianna Fuller Mircheff

*Judge's signature*

City and state: Los Angeles, California

Hon. Brianna Fuller Mircheff, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Sarah Kim, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint and arrest warrant against Shunyu An, also known as ("aka") Jane Yang, aka Vivian An (hereinafter "AN") for a violation of Title 18, United States Code, Section 1546 (Fraud and Misuse of Visas, Permits, and Other Documents).

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only, all amounts or sums are approximate, and all dates and times are on or about those indicated.

**II. BACKGROUND OF AGENT**

3. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), United States Department of Justice, and have been so employed since September 2018. I am currently assigned to the Los Angeles Field Office and have been with an International Terrorism Extraterritorial Squad that is part of the Joint Terrorism Task Force since March 2019. My squad,

among other things, is responsible for Southeast Asia, which includes the Philippines. We are responsible for investigating major incidents including major violent crime matters occurring in that area against the United States and its interests. I have personally served as the Counter Terrorism Acting Assistant Legal Attaché in Jakarta, Indonesia in 2022 and 2023, during which I assisted in numerous investigations, including crimes committed against United States nationals overseas. I have received specialized training in conducting criminal and counter-terrorism investigations and have consulted with my colleagues who have many years of experience investigating criminal and terrorism crimes. Specifically, I have received 19 weeks (approximately 760 hours) of instruction in the fundamentals of law, ethics, behavioral science, interviewing, report writing, firearms, surveillance, defensive tactics, and case management at the FBI Academy in Quantico, Virginia. I have received additional training in evidence collection, electronic devices and data, criminal statutes, and a variety of criminal offenses, including financial and violent crimes.

### **III. SUMMARY OF PROBABLE CAUSE**

4. During the course of an investigation into the kidnapping and subsequent murder of two individuals in the Philippines in late June 2024, the FBI identified a network of several individuals, including Hanwen Liu, aka Han Wen Liu, aka Derrick Wong, aka Victor Lao (hereinafter "LIU"), connected to the kidnapping.

5. As detailed below, during the course of the investigation, the FBI learned that LIU had sought entry into the United States under two different aliases--Derrick Wong and Victor Lao--and submitted false documents and false information in connection with his applications for legal status in the United States. On October 4, 2024, the Honorable Charles F. Eick, United States Magistrate Judge, authorized a complaint and arrest warrant for LIU, finding probable cause that LIU violated Title 18, United States Code, Section 1546 (Fraud and Misuse of Visas, Permits, and Other Documents).

6. In 2019, LIU used the alias Victor Lao to attempt to obtain a visa to the United States. At that time, he listed AN (using the alias Vivian An) as his wife. Also at that time, AN applied for a visa to enter the United States, under the name Vivian An. Then, in February 2024, hours before LIU entered the United States using a German passport that said he was Derrick Wong, and that he was born in Tel Aviv, Israel, AN entered the United States at the same border crossing using a German passport that said her name was Jane Yang, and that she was born in Tel Aviv, Israel in 1984. AN's photograph and thumbprint from her California Driver's License in the name of Jane Yang, matched the 2019 visa application in the name of Vivian An.

7. In August 2024, AN applied for lawful permanent resident status claiming she married a United States citizen with initials S.Z., that her name was Jane Yang, and that she was born in Tel Aviv, Israel in 1984.

8. When interviewed by a Customs and Border Protection ("CBP") Officer at John F. Kennedy International Airport ("JFK") on October 15, 2024 (after being refused entry into the United Kingdom using the alias Jane Yang), AN admitted that her name was not Jane Yang, that she was not born in Tel Aviv, Israel in 1984, and that she was in fact a citizen of the People's Republic of China. AN also admitted that her daughter (traveling under the name Valentina Yang) was similarly traveling under false representations about her name, date of birth, and place of birth. According to AN, from 2017 to present she and her minor daughter traveled to multiple countries with LIU using multiple different fraudulently obtained identities.

9. For these reasons, as further detailed below, there is probable cause to believe that AN's lawful permanent resident status application, submitted in August 2024, contained false representations, including as to her name, birthplace, and date of birth. Further, there is probable cause to believe that AN presented a fraudulent birth certificate and a fraudulently obtained German passport in support of her lawful permanent resident status application. Finally, there is probable cause to believe that AN lied by answering "no" to questions in this application, including by saying she has never lied, concealed, or misrepresented any information for admission to the United States or for any other immigration benefit.

**IV. STATEMENT OF PROBABLE CAUSE**

10. According to a report I have reviewed from the FBI Assistant Legal Attaché in Beijing, on or about June 20, 2024, two individuals (a dual United States-People's Republic of China citizen and a People's Republic of China citizen) were kidnapped after arriving in Manila, Philippines for a purported business meeting. Both victims' families were contacted using the victims' accounts and asked to pay a ransom; one family transferred \$410,000 as instructed to a cryptocurrency account. On or about June 25, 2024, approximately nine hours away from Manila, two corpses believed to be the two kidnapped individuals were found. As one of the deceased individuals was a dual United States-People's Republic of China citizen, the FBI began an investigation.

11. Following this kidnapping, the government of the People's Republic of China provided the FBI information about individuals they had identified as involved in the kidnapping as well as other potentially related kidnappings. One of the individuals identified by the government of China was LIU. According to the People's Republic of China government, an alias LIU has been known to use is "Victor Uy Lao."

12. A Biometric Images Examiner within the FBI's Special Processing Center-Biometric Technology Center compared the fingerprints an arrest warrant the People's Republic of China provided for LIU with the fingerprints of an individual that entered the United States on February 12, 2024 using the name Derrick Wong with a German passport saying Derrick Wong had been

born in Tel Aviv, Israel with a 2019 visa application described below in the name Victor Lao, saying Victor Lao had been born in Bacolod City, Philippines. According to the Biometric Images Examiner, the three sets of fingerprints all appear to be from the same individual.

13. On October 4, 2024, the Honorable Charles F. Eick, United States Magistrate Judge, authorized a complaint and arrest warrant for LIU, finding probable cause that LIU violated Title 18, United States Code, Section 1546 (Fraud and Misuse of Visas, Permits, and Other Documents). On or about October 10, 2024, at a hotel in Times Square in New York, New York, LIU was arrested on that complaint and ordered detained.

**A. 2019: AN and LIU Submitted Visa Applications Containing False Information**

14. I have reviewed records maintained by the Department of State including records from the Consular Electronic Application Center ("CEAC"), which is a website that allows people to apply for a nonimmigrant visa to the United States. Specifically, I reviewed the CEAC application and related documents to a January 28, 2019 application for a temporary visitor in the name of "Victor Lao." In this visa application, "Victor Lao" listed his date of birth as July 2, 1976, and birthplace as Bacolod City, Philippines, with a Philippines passport with number P5591855A. He said his spouse was "Vivian An," with a date of birth of January 2, 1984, and birthplace as Bacolod City, Philippines. According to this application, "Victor Lao" and "Vivian An" shared a child, "Tina Lao," and

they were presently residing in Malta. A birth certificate and marriage certificate were submitted in support of this application.

15. Another CEAC I have reviewed within records maintained by the Department of State was another application for a temporary visitor submitted on January 28, 2019, in the name of "Vivian An." In this visa application, "Vivian An" listed her date of birth as January 2, 1984, and birthplace as Bacolod City, Philippines, with a Philippines passport with number P5587937A. She said her spouse was "Victor Lao," with a date of birth of July 2, 1976, and birthplace as Bacolod City, Philippines. According to this application, "Vivian An" and "Victor Lao" shared a child, "Tina Lao," and they were presently residing in Malta. As part of this application "Vivian An's" fingerprints were taken. A birth certificate and marriage certificate were submitted in support of this application.

16. According to records maintained by the Department of State, the visa applications of "Vivian An" and "Victor Lao" were both denied. Further, according to the records maintained by the Department of State, these were denied because the documents submitted in connection with these applications were determined to be fraudulent.

17. I have reviewed a photograph of the Philippines passport number P5587937A in the name of Vivian An. This passport purports to have been issued on January 11, 2018. The passport lists Vivian An's birthdate as January 2, 1984, and her birthplace as Bacolod City, Philippines.



18. I have reviewed a photograph of the Philippines passport number P6368046A in the name of Tina Lao. This passport purports to have been issued on March 11, 2018. The passport lists Tina Lao's birthdate as May 16, 2007, and her birthplace as Bacolod City, Philippines.

**B. February 2024: AN Enters the United States Under a False Name and Passport**

19. I have reviewed records maintained by Customs and Border Protection ("CBP") relating to AN's February 10, 2024 at 10:36 a.m. Eastern Standard Time ("EST") application to enter the United States submitted through the Electronic System for Travel Authorization ("ESTA").<sup>1</sup> From this application, I learned the following:

a. AN stated that her name was Jane Yang, her date of birth was January 12, 1984 and her birthplace was Tel Aviv, Israel.

b. AN used a German passport with number C4YM274V5.

c. AN answered "No" to the following questions: (1) "Have you ever been issued a passport or national identity card for travel by another country?" (2) "Have you ever been a citizen or national of another country?" and (3) "Have you ever committed fraud or misrepresented yourself or others to obtain, or assist others to obtain, a visa or entry into the United States?"

d. AN's ESTA was approved on February 10, 2024.

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<sup>1</sup> This was submitted approximately four minutes after and listing the same email address, and using the same IP Address, as LIU's ESTA in the name of Derrick Wong.

e. AN entered the United States after submitting an ESTA under the Visa Waiver Program.<sup>2</sup>

20. According to my review of records maintained by CBP, AN used the above-described German passport to enter the United States on a bus across the border at San Ysidro on February 12, 2024, at approximately 4:20 p.m. PDT.<sup>3</sup>

21. I have reviewed a photograph of the German passport AN used to enter the United States. This passport purports to have been issued on February 1, 2023, lists the name Jane Yang, date of birth as January 12, 1984, and birthplace as Tel Aviv, Israel.

22. According to California Department of Motor Vehicles records that I have reviewed, AN obtained a California driver's license in May 2024 under the name Jane Yang on the same date LIU obtained a California driver's license under the name Derrick Wong. AN's driver's license identified her date of birth as January 12, 1984, her height as 5'4" tall, and as having black hair and brown eyes. AN's address on her driver's

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<sup>2</sup> Based on my training and experience, the Visa Waiver Program allows citizens or nationals of certain countries, including Germany, to enter the United States without a visitor's visa if their travel is for business or pleasure and less than 90 days in duration. See <https://esta.cbp.dhs.gov/>. Germany is a Visa Waiver country. China is not included in the visa waiver program.

Under this program, AN was authorized to stay in the United States for 90 days. On July 11, 2024, her approval to remain in the U.S. was denied with a notation that AN had overstayed her 90-day visa waiver.

<sup>3</sup> This was approximately two hours before LIU (using the alias Derrick Wong) entered the United States as the same border crossing in a car with a Chinese national named Yifei Li.

license was an address in Azusa, California (hereinafter the "Azusa Address").

**C. July 2024: AN Applies for Lawful Permanent Resident Status and Provides False Information and a Fake Birth Certificate**

23. I have reviewed records maintained by USCIS relating to AN's July 12, 2024 I-485 Application to Register Permanent Residence or Adjust Status (the "Application").<sup>4</sup> From the Application, I learned the following:

a. AN signed the Application under the name Jane Yang with an ink signature under penalty of perjury. An individual with the initials S.Z. signed as the preparer of the document.

b. According to the envelope, the sender was S.Z. from the Azusa Address (which is within the Central District of California). According to the postmark, it was mailed from zip code 91754, which I know to be within the Central District of California.

c. The Application listed Jane Yang as the only name she had used since birth.

d. The Application listed her physical address the Azusa Address, her birthplace as Tel Aviv, Israel, with a date of birth of January 12, 1984, with a German passport with number C4YM274V5, having arrived in the United States on February 12, 2024, as a visitor.

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<sup>4</sup> The Application indicated it was signed on August 8, 2024. The postmark on the mailing label on the envelope it was sent in was also dated August 8, 2024.

e. Among the questions asked in the Application were: (1) "Have you ever been denied admission to the United States?" (2) "Have you ever been denied a visa to the United States?" (3) "Have you ever committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime)?" (4) "Have you ever submitted fraudulent or counterfeit documentation to any U.S. Government official to obtain or attempt to obtain any immigration benefit, including a visa or entry into the United States?" and (5) "Have you ever lied about, concealed, or misrepresented any information on an application or petition to obtain a visa, other documentation required for entry in the United States, admission to the United States, or any other immigration benefit?" AN answered no to all these questions.

24. I have reviewed records maintained by USCIS relating to a July 12, 2024 Form I-130 Petition for Alien Relative<sup>5</sup> (the

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<sup>5</sup> I know, based on my training and experience and from speaking with HSI Special Agents that are familiar with immigration enforcement, that, in the case of a marriage between a U.S. citizen and an alien, the Form I-130, Petition for Alien Relative is completed and submitted to USCIS by the U.S. citizen on behalf of the alien spouse. Once the Form I-130 is approved, the alien spouse completes and signs a Form I-485, Application to Register Permanent Residence or Adjust Status, and submits this to USCIS. Once USCIS receives these forms, the alien spouse is allowed to remain legally in the United States until USCIS adjudicates the petition. If USCIS approves the Form I-485, it will give the alien spouse a conditional resident permit that authorizes the alien to reside and work in the United States for two years. After two years, the U.S. citizen and the alien spouse must file a Form I-751, Request to Remove Conditions, which asks USCIS to remove the conditional residence status. If USCIS approves the Form I-751, it gives the alien spouse unconditional permanent residence status.

"Petition") made on AN's behalf by the individual with initials S.Z. From the Petition, I learned the following:

a. S.Z. submitted the Petition and stated that AN was his spouse. According to the Petition, S.Z. and AN married in the State of Nevada on May 8, 2024 (approximately eight days after S.Z.'s marriage to another individual ended). S.Z. gave the Azusa Address as his residence and said AN had been residing there since March 1, 2024. The Petition listed AN's child as "Valentina Yang." S.Z. also filed a petition on the behalf of Valentina Yang.

b. S.Z. stated AN's birthplace was Tel Aviv, Israel, and his date of birth was January 12, 1984. S.Z. stated that AN entered the United States on February 12, 2024, using a German passport with number C4YM274V5, with an authorized stay under "Visitor for Pleasure" until August 11, 2024.

c. S.Z. submitted four passport-sized photographs of AN with the Petition. The individual in these photographs appears to be the same individual as the photograph on the German passport AN used to enter the United States and the photograph on AN's California Department of Motor Vehicles identification discussed in paragraphs 21 to 22 above.

d. As part of the Application, among other documentation, AN submitted a document that purports to be a birth certificate issued by the Ministry of the Interior of the State of Israel in the name of "Jane Yang" born on January 12, 1984 to John Li and Tova Drucker at Assuta Hospital in Tel Aviv, Israel.

25. According to USCIS, the Application is still pending adjudication.

26. Based on my knowledge of the investigation, I believe that AN made false representations in her I-485 Application, including about her name, birthplace, and date of birth. I also believe that the German passport she relied upon was fraudulently obtained. I further believe, based on my knowledge of the investigation, that AN lied when she answered "no" to several of the questions referred to above in paragraph 23.e.

**D. Photographs Belonging to AN, "Jane Yang," and "Vivian An" and Fingerprints Belonging to "Vivian An" and "Jane Yang" All Match**

27. A Biometric Images Examiner within the FBI's Special Processing Center-Biometric Technology Center compared the thumbprint from JANE YANG's California Driver's License to the fingerprints from a visa application in 2019 made by "Vivian An" using the above-described Philippines passport. According to the Biometric Images Examiner, both sets of fingerprints appear to be the same individual in their opinion.

28. The photograph of the individual in AN's California Department of Motor Vehicles photograph (in the name Jane Yang), AN's German passport (in the name Jane Yang), AN's Philippines passport (in the name Vivian An), and the photographs submitted with AN's lawful permanent resident application all appear to all be of the same individual in my opinion.

29. Further, I have reviewed a Department of State B1/B2 Temporary Visitor Visa Application submitted by Shunyu An on March 7, 2016. This visa application purports that Shunyu An's

People's Republic of China passport number E45671023 was issued on March 6, 2015. The visa application lists Shunyu An's birthdate as January 2, 1986, and her birthplace as Heilongjiang, China. The photograph of the individual in this passport appears to be the same individual as the photographs described in the preceding paragraph.

**E. October 2024: AN Admits She Provided False Information for Immigration Purposes**

30. According to records I have reviewed maintained by CBP, on or about October 12, 2024 (two days after LIU was arrested in a hotel in Times Square in New York, New York), individuals using the names "Jane Yang" and "Valentina Yang" booked one-way flights from John F. Kennedy International Airport in Queens, New York ("JFK") to Heathrow Airport in London, England. According to FBI agents who spoke to the individual traveling on the ticket in the name "Jane Yang," they recognized it to be AN based on the previously-described photographs. At JFK, before their flight departed, AN said that she knew "Derrick Wong" through a friend of a friend and she was leaving the United States because her friend Derrick Wong had been arrested. AN called the individual with initials S.Z., whom she said was her husband, to translate for her.

31. According to FBI agents who spoke to the individual traveling under the name "Valentina Yang," she said she was the daughter of Jane Yang, that she has never been to Germany, that she was born in China and that they would have to ask her mom why her passport said she was born in Israel. She further told

the agents she has been staying in a hotel in Times Square since March or April of 2024 and that Derrick Wong was one of her mom's friends.

32. According to a report by the Assistant Legal Attaché in London United States Embassy personnel, when these individuals using the names Jane and Valentina Yang arrived at Heathrow Airport, their belongings were searched by the United Kingdom Border Force. According to CBP personnel in London Heathrow Airport, in "Jane Yang's" possession, they saw a German passport in the name of Derrick Wong (which I recognize in a photograph to be the passport used by Hanwen Liu to enter the United States in February 2024), an Israeli birth certificate (which I recognize in a photograph to be the birth certificate submitted in support of Hanwen Liu's application for lawful permanent resident status in the name of Derrick Wong), and other immigration forms.

33. According to CBP personnel in Heathrow Airport, these individuals were refused entry to the United Kingdom by United Kingdom Border Force and returned to the United States on Virgin Atlantic flight number VS 153, which landed at JFK at approximately 7:35 p.m. Eastern Daylight Time ("EDT") on October 15, 2024.

34. After these individuals landed at JFK, a CBP officer fluent in both Mandarin and English interviewed the one using the name "Jane Yang" in Mandarin. According to this CBP officer, he recognized this individual to be AN based on the previously-described photographs. According to this CBP officer



and his translation, among other things AN told him that "Jane Yang" was not her real name, that she fled China with Hanwen Liu (a previous romantic partner of AN's) in or around 2017, that Hanwen Liu has a Red Notice from China,<sup>6</sup> and that they have used multiple nationalities and identities including Philippines (in the names of Vivian An and Victor Lao), Cyprus (in the names of Vivian Nikitas and Nikita Nikitas), and presently Germany (in the names of Jane Yang and Derrick Wong). According to AN, Hanwen Liu introduced her to S.Z., so that she could marry him to apply for lawful permanent resident status. She further told the CBP officer, that her daughter, traveling with her is a minor, and has traveled on similarly false information.

35. AN told the CBP officer that AN was Chinese and born in China and that she only left China because of Hanwen Liu.

36. Further, according to AN, of the devices she had with her, one belongs to Hanwen Liu. On one of the devices AN said belonged to her (a cellular phone), she showed the CBP Officer a photograph of a People's Republic of China passport. This passport had number E45671023, was in the name of "Shunyu An," listed a date of birth of January 2, 1986, and a birthplace of Heilongjiang, China. AN told the CBP officer this was her real identity. I saw a photograph of the passport photograph AN

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<sup>6</sup> I have seen an Interpol Red Notice associated with this passport. According to the Interpol Red Notice, LIU has been charged with Article 176 (Illegally Absorbing Deposits from the Public) by the People's Republic of China government. This Interpol Red Notice included a photograph. The photograph of the individual in the Interpol Red Notice appears to be the same individual in Victor Lao's CEAC application and German passport in the name of Derrick Wong used to enter the United States on February 12, 2024 in my opinion.

showed the CBP Officer, which I recognize to be the same Chinese passport referred to in AN's 2016 visa application referred to above in paragraph 29.

**F. Person-1 Provides Information about LIU and AN to the FBI**

37. In or around February 2024 an individual referred to hereinafter as Person-1<sup>7</sup> submitted online tips to the Los Angeles Police Department and USCIS that individuals known as "Derrick Wong" and "Jane Yang" were committing immigration fraud. Person-1 identified a California Department of Motor Vehicles photograph in the name of "Derrick Wong"<sup>8</sup> as the individual Person-1 knows as "Derrick Wong." Person-1 identified the California Department of Motor Vehicles photograph for Jane Yang<sup>9</sup> as the individual Person-1 knows as "Jane Yang." Based on my subsequent interviews with Person-1 and my review of reports of other FBI agents' interviews with Person-1, I learned the following:

a. Person-1 assists newly immigrated Chinese citizens with services, for example getting vehicles, lodging, or legal assistance, for a fee. LIU (under the alias Derrick Wong) contacted Person-1 for assistance while LIU was in Mexico

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<sup>7</sup> The FBI has the identifying information for Person-1 and can provide it to the Court if helpful. According to Person-1, he left China after leaders of the large state sponsored company he worked for laundered money through Person-1's personal bank accounts and his account was frozen. According to CBP records I reviewed, Person-1 entered the United States across the border with Mexico in August 2022 and he has applied for asylum, which is still pending.

<sup>8</sup> Which I recognize as LIU.

<sup>9</sup> Which I recognize as AN.

before entering the United States. LIU told Person-1 that he previously was denied entry to the United States when using his Chinese passport and was concerned about using his German passport to enter the United States, as his fingerprints would match his Chinese passport. Person-1 told LIU that with a German passport LIU could file an application online for ESTA. I recognize the address that LIU provided on his ESTA application as described in paragraph 19 above as Person-1's address.

b. LIU told Person-1 he was able to get a German passport by exploiting "German Legislation 116."<sup>10</sup> According to what LIU told Person-1, individuals were able to file for Israeli documents at German Embassies in Ireland and London for a fee of \$600,000 and it took 12 to 14 months to complete the process. LIU told Person-1 that he knew of ways to obtain identities and papers for individuals in Germany, Israel, Cyprus, Malta, Hungary, and the Philippines.

c. LIU described AN as his boss's wife. According to Person-1, LIU and AN traveled together. For example, according to what a friend told Person-1, this friend drove LIU and AN to the Los Angeles International Airport in early August 2024.

#### **G. Training and Experience Concerning Immigration Fraud**

38. Based on my training and experience, as well as conversations with HSI Special Agents familiar with immigration

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<sup>10</sup> According to my review of a German website, Article 116 allows individuals who were deprived of their German nationality by persecution under the Nazi regime to renationalize.

fraud, the methods employed by individuals attempting to fraudulently obtain immigration and citizenship benefits include entering the United States pursuant to a limited-stay and limited-purpose visa (for example, a tourist visa, or comparable entry under the Visa Waiver Program as explained in n. 2); extending or changing the limited-stay/limited-purpose status through a fraudulent marriage to a United States citizen; submitting fake, altered, or fraudulent documents to USCIS; making false or deceptive statements to immigration officials or in applications; and testifying falsely under oath (which includes including false information in applications that are signed under the penalty of perjury) in immigration interviews and proceedings.

39. I understand that individuals engaged in immigration fraud often use immigration documents obtained through fraud for various purposes, including obtaining social security cards, driver's licenses, credit cards, and bank accounts; obtaining employment and employment-related licenses and permits; and re-entering the United States after foreign travel. I further understand that it is common for these individuals to have multiple identities that they use to travel between countries without detection and without lawful authority. Further it is not uncommon for individuals engaged in immigration fraud to give the United States citizens that they use to adjust their status (for example by marriage) to provide those United States citizens with benefits or other compensation.

**V. CONCLUSION**

40. For all of the reasons described above, there is probable cause to believe that Shunyu An, aka Jane Yang, aka Vivian, has committed a violation of Title 18, United States Code, Section 1546 (Fraud and Misuse of Visas, Permits, and Other Documents).

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 16th day of October, 2024.



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THE HONORABLE BRIANNA FULLER MIRCHEFF  
UNITED STATES MAGISTRATE JUDGE